

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	)	<b>Chapter 7</b>
	)	
	)	
<b>MICHAEL J. POLLACK and</b>	)	<b>Case No. 17-18146-amc</b>
<b>ELAINE G. POLLACK,</b>	)	
	)	
<b>Debtors.</b>	)	
	)	

**OBJECTION OF GARY F. SEITZ, CHAPTER 7 TRUSTEE, TO THE MOTION OF  
COVENANT BANK FOR RELIEF FROM THE AUTOMATIC STAY**

Gary F. Seitz, Chapter 7 Trustee in the above-captioned bankruptcy case (the “Trustee”), by and through undersigned counsel, hereby objects to the Motion of COVENANT BANK (“Movant”) for Relief from the Automatic Stay (the “Motion”), and, in support thereof, respectfully state as follows:

1. Admitted, upon information and belief.
2. Admitted.
3. Denied. The allegations in this paragraph reference a document, the truth of which speaks for itself and to which no response is required.
4. Denied. The Trustee is without sufficient information to admit or deny the allegations in this paragraph and therefore denies same.
5. Denied. The allegations in this paragraph reference a document, the truth of which speaks for itself and to which no response is required.
6. Denied. The allegations in this paragraph reference a document, the truth of which speaks for itself and to which no response is required.
7. Denied. The allegations in this paragraph reference a document, the truth of which speaks for itself and to which no response is required.

8. Denied. The allegations in this paragraph reference a document, the truth of which speaks for itself and to which no response is required.

9. Denied. The allegations in this paragraph reference a document, the truth of which speaks for itself and to which no response is required.

10. Denied as a conclusion of law.

11. Denied. The Trustee is without sufficient information to admit or deny the allegations in this paragraph and therefore denies same.

12. Denied. The Trustee is without sufficient information to admit or deny the allegations in this paragraph and therefore denies same.

13. Denied. The Trustee is without sufficient information to admit or deny the allegations in this paragraph and therefore denies same.

14. Denied. The Trustee is without sufficient information to admit or deny the allegations in this paragraph and therefore denies same.

15. Denied as a conclusion of law. By way of further response, the case is just over one month old, and the meeting of creditors has not taken place as of the date of this Objection. The Trustee is in need of some additional time to investigate the potential valuation of the mortgaged premises to determine whether to retain a real estate agent to market and sell the Debtors' real property, for the benefit of all creditors, including Movant.

16. Denied as a conclusion of law.

17. Admitted.

WHEREFORE, the Trustee respectfully requests that the Court deny the relief requested in the Motion, and for such other relief as this Court may deem just and proper.

Dated: January 25, 2018

GELLERT SCALI BUSENKELL & BROWN LLC

/s/ Holly E. Smith

Holly E. Smith, Esquire  
601 Walnut Street, Suite 750 West  
Philadelphia, PA 19106  
Phone: (215) 238-0012  
Fax: (215) 238-0016  
hsmith@gsbblaw.com

*Counsel for the Chapter 7 Trustee*